

**FILED**  
APR 04 2022

CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Juana Lorena Hernández  
Plaintiff,

vs.

Archdiocese of San Francisco

Defendant(s).

**AGT**  
**CV22 02132**  
CASE NO.

EMPLOYMENT DISCRIMINATION  
COMPLAINT

1. Plaintiff resides at:

Address 1295 45th Ave Apt. 5

City, State & Zip Code San Francisco, CA 94122

Phone (415) 665-9527

2. Defendant is located at:

Address One Peter Yorke Way

City, State & Zip Code San Francisco, CA 94109

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred on this Court by 42 U.S.C. Section 2000e-5.

Equitable and other relief is sought under 42 U.S.C. Section 2000e-5(g).

4. The acts complained of in this suit concern:

a. ☒ Failure to employ me.

b. ☐ Termination of my employment.

1 c. ☐ Failure to promote me.

2 d. ☒ Other acts as specified below.

3 Disparagement - treated differently on same position  
 4 On March 8, 2019; Christine Escobar, Human  
 5 Resources Manager, refused to hire me after filing a wage  
 6 claim with the Department of Industrial Relations over a  
 7 position I held within the Archdiocese; therefore, retaliated  
 8 against me. Furthermore, before retaliation occurred, defendant failed  
 9 to take all reasonable steps to prevent such retaliation from occurring.

5. Defendant's conduct is discriminatory with respect to the following:

10 a. ☒ My race or color.

11 b. ☐ My religion.

12 c. ☐ My sex.

13 d. ☐ My national origin.

14 e. ☐ Other as specified below.

15 Title VI

16 6. The basic facts surrounding my claim of discrimination are:

17 Christine Escobar, HR Manager at the Archdiocese of San Francisco  
 18 denied me a job for which I fully qualified after filing a wage claim  
 19 The actions of defendant's employees were caused by and were  
 20 in retaliation for the protected activity I set forth in above.  
 21 Hiring was denied after defendant's employee Christine Escobar  
 22 became aware that I had filed a wage claim with the Labor Commissioner.  
 23 Despite defendant's, actual or constructive, knowledge of the above-mentioned  
 24 retaliation, and the knowledge of her supervisors and agents, defendant failed  
 25 to take immediate and appropriate corrective action to stop the retaliation.

25 7. The alleged discrimination occurred on or about March 8, 2019.

26 Furthermore, before the retaliation occurred, defendant failed to take all reasonable  
 27 steps to prevent such retaliation from occurring  
 (DATE)

27 8. I filed charges with the Federal Equal Employment Opportunity Commission (or the

28 California Department of Fair Employment and Housing) regarding defendant's alleged

1 discriminatory conduct on or about 10/2019.

2 (DATE)

3 9. The Equal Employment Opportunity Commission issued a Notice-of-Right-to-Sue letter  
4 (copy attached), which was received by me on or about April 5, 2021.

5 (DATE)

6 10. Plaintiff hereby demands a jury for all claims for which a jury is permitted:

7 Yes ☒ No ☐

8 11. WHEREFORE, plaintiff prays that the Court grant such relief as may be appropriate,  
9 including injunctive orders, damages, costs, and attorney fees.

10  
11 DATED: April 4, 2022

Julia Lorena Hernández A.  
SIGNATURE OF PLAINTIFF

12  
13  
14 (PLEASE NOTE: NOTARIZATION  
15 IS NOT REQUIRED.)

Julia Lorena Hernández

PLAINTIFF'S NAME

(Printed or Typed)